

1) Ghoneimy teaches a workflow distributing apparatus and method that adapts the workflow to different environments using adapter programs usually in the form of files where an adapter is assigned during the design and configuration phase of adapting the workflow for a specified environment. The specified files are included in the runtime phase to adapt the workflow to the specified environment. During execution of the workflow, the adapter files execute in the workflow engine and client and are not accessible by a user of the workflow. Specifically, Ghoneimy does not teach the classification of files to be attached or downloaded nor teach a workflow step to attach a file of a specified classification or a workflow step to download a file of a specified classification.

2) Per claims 21, 28, and 36, Ghoneimy:

pp 0055-0065 provides for the classification of adapters and specification of files for adapting the workflow to an environment. The classification of a file is performed in the workflow adaptation phase to specify the files that are downloaded into the workflow engine or the client during workflow execution to adapt the workflow to an environment. These files are not accessible to the workflow users; Ghoneimy does not teach classification of a file for attachment or download by users during the execution of a workflow route;

pp 0079-0082 provides for scripting by the workflow designer (called a user by Ghoneimy but this is not the user of the workflow) to create sub-process to adapt a process to different sets of workflow users; Ghoneimy does not teach dividing a processes that attaches and downloads files into attachment and download steps;

pp 0085 provides for the downloading of Java programs to adapt the workflow client and these files execute as part of the client program. These files are not accessible by the workflow users; Ghoneimy does not teach providing a route step for a workflow user to attach a file of specified classification or download a file of specified classification;

pp 0085-0089 provides for downloading Java programs into the workflow client for execution by the browser. These files are not accessible by the workflow user;

Ghoneimy does not teach providing a route with route steps that attach or download files with specified classification to implement a workflow controlled process.

pp 0065 provides a list of model components defining file types for adapting a workflow. These files are not accessible by the workflow user; Ghoneimy does not teach defining a file of a first classification type accessible for attachment or download by the workflow user.

pp 0091-0102 provides the processes to execute the adaptive programs, the files specified in pp 0055-0065, so the workflow and client are adapted to the specified environment. The adaptive programs are not accessible by the workflow user and the user is presented a screen as the result of the adaptation. The screen does not direct the attachment or download of a classified file; Ghoneimy does not teach in response to a workflow step the presentation of a screen to attach or download a file of specified classification or a user performing the attachment or download of a file.

pp 0105-0111 provides predefined clients for common environments and a developer client for developers ("users" in Ghoneimy's nomenclature are the workflow adapters not workflow users) to adapt less common environments; Ghoneimy does not teach downloading a first file of first classification, processing the first file to a second file of second classification, and attaching the second file. pp 0113 and Table 1 provide menu bars which may be in file form that are downloaded into the client. The menu bar as a file is not accessible to the workflow user but rather executes in the client to display as part of the user screen; Ghoneimy does not teach the downloading of a file as specified in a workflow step.

3) Per claims 22 and 29, Ghoneimy pp 0065-0071 provides for nested relationships between adapters where a thumbnail can invoke a development process or a client is a subset of a client describing a broad general relationship between functional capabilities that can be described as parent child but not a parent child relationship as with files in a file directroy. The workflow user does

not have access to the files that implement these relationships nor can attach or download these files; Ghoneimy does not teach forming a relationship between a third file and fourth file that are accessible to the workflow user and a file attachment that attaches these files maintaining the relationship.

4) Per claims 23, 31, and 40, Ghoneimy pp 0055-0071 describe in general terms the structure and layering of the mechanisms for adapting a workflow to an environment using adapters. The adapters are not accessible to the workflow users who are presented with the end result of the adaptation; Ghoneimy does not describe the adapter files as having file names and does not teach distinguishing files that have the same name.

5) Per claims 24 and 32, The reference for Ghoneimy is most likely for Bengston column 12 lines 50-67; column 13 lines 1-10 from the previous correspondence; Ghoneimy does not describe the workflow mechanisms for looping and is mute on distinguishing files for each loop.

6) Per claims 25, 33, 34, and 39, Ghoneimy pp0091-0111 provides the adaptation tools for designers to adapt a workflow to an environment; Ghoneimy does not describe workflow mechanisms for conditional branching and a means for the workflow user to indicate the branch choice.

7) Per claims 26 and 35, Ghoneimy pp 0065-0071 provides a description of the adaptation mechanisms using adapter programs which are most likely files. The files are transferred to the workflow engine or client to implement the workflow in the adapted environment. The adapter programs are not accessible by the workflow user. Ghoneimy does not teach classifying workflow user accessible files or specifying the downloading of files based on the file classification.

8) Per claims 27, 30, and 38, Ghoneimy pp 0065-0071 provides a description of the adaptation mechanisms using adapter programs which are most likely files.

The files are transferred to the workflow engine or client to implement the workflow in the adapted environment. The adapter programs are not accessible by the workflow user; Ghoneimy does not disclose a parent-child relationship for files accessible by the workflow user or the ability to download files based on a parent-child relationship.

The claims those of submitted on December 17, 2007 and are attached for reference.

Claims are grouped 21-27, 28-35, and 36-40 where claims 21, 28, and 36 are independent claims.

#### Conclusion

The present invention differs significantly from the workflow adaptation invention disclosed by Ghoneimy et al U.S. Publication 20040078373; the differences are described in the detailed discussion.

The present invention provides a useful function and is uniquely different from the prior art.

The attention and assistance of the examiner and the thorough examination are greatly appreciated.

A Word document file can be sent to the Examiner. Please send an e-mail to me at [Ken.Ouchi@avidtechs.com](mailto:Ken.Ouchi@avidtechs.com) and I will send you the file.

Please call me at 408-757-5862 after you have read this response.

Respectfully submitted



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